

UNITED STATES DISTRICT COURT  
DISTRICT OF MINNESOTA

UNITED STATES OF AMERICA,

**INDICTMENT**

Plaintiff,

18 U.S.C. § 2

21 U.S.C. § 841(a)(1)

v.

21 U.S.C. § 841(b)(1)(B)

21 U.S.C. § 846

21 U.S.C. § 853

- (1) DAWN LEE KIER,
- (2) CRAIG STEVEN JACKSON, JR.,
- (3) ALETHA ROCHELLE PIRTLE, and
- (4) JATWAIN MARTEZ WILLIAMS,

Defendants.

THE UNITED STATES GRAND JURY CHARGES THAT:

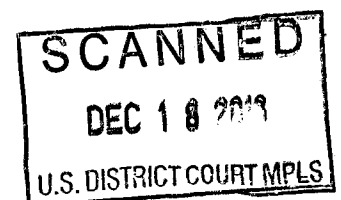
**COUNT 1**

(Conspiracy to Distribute Heroin and Fentanyl)

On or in April 2018, to include April 12, 2018, in the State and District of Minnesota, the defendants,

**DAWN LEE KIER,  
CRAIG STEVEN JACKSON, JR.,  
ALETHA ROCHELLE PIRTLE, and  
JATWAIN MARTEZ WILLIAMS,**

did unlawfully, knowingly, and intentionally conspire with others, known and unknown to the grand jury, to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a controlled substance, and 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide (fentanyl), a controlled substance, all in violation of Title 21, United States Code, Sections 841(a)(1), 841(b)(1)(B), and 846.



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**COUNT 2**

(Possession with Intent to Distribute Fentanyl)

On or about April 12, 2018, in the State and District of Minnesota, the defendants,

**ALETHA ROCHELLE PIRTLE and  
JATWAIN MARTEZ WILLIAMS,**

by aiding and abetting and being aided and abetted by others known and unknown to the grand jury, did unlawfully, knowingly, and intentionally possess with intent to distribute 40 grams or more of a mixture and substance containing a detectable amount of N-phenyl-N-[1-(2-phenyl-ethyl)-4-piperidinyl] propanamide (fentanyl), a controlled substance, all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B)

**COUNT 3**

(Possession with Intent to Distribute Heroin)

On or about April 12, 2018, in the State and District of Minnesota, the defendants,

**DAWN LEE KIER and  
CRAIG STEVEN JACKSON, JR.,**

by aiding and abetting and being aided and abetted by others known and unknown to the grand jury, did unlawfully, knowingly, and intentionally possess with intent to distribute 100 grams or more of a mixture and substance containing a detectable amount of heroin, a controlled substance, all in violation of Title 18, United States Code, Section 2, and Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B).

**FORFEITURE ALLEGATIONS**

Counts 1 through 3 of this Indictment are incorporated by reference for the purpose of alleging forfeitures pursuant to Title 21, United States Code, Section 853.

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If convicted of any of the counts in this Indictment, the defendants,

**DAWN LEE KIER,  
CRAIG STEVEN JACKSON, JR.,  
ALETHA ROCHELLE PIRTLE, and  
JATWAIN MARTEZ WILLIAMS,**

shall forfeit to the United States pursuant to Title 21, United States Code, Sections 853(a)(1) and (2), any and all property constituting, or derived from, any proceeds the defendants obtained directly or indirectly as a result of said violations, and any and all property used, or intended to be used, in any manner or part to commit or to facilitate the commission of said violations. If any of the above-described forfeitable property is unavailable for forfeiture, the United States intends to seek the forfeiture of substitute property as provided in Title 21, United States Code, Section 853(p).

A TRUE BILL

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UNITED STATES ATTORNEY

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FOREPERSON